## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

LISA ALYN,	)
Plaintiff, v.	)
	) Case No. 3:15-cv-00596
	) District Judge Waverly D. Crenshaw, Jr.
	) Magistrate Judge John S. Bryant
	) JURY DEMAND
SOUTHERN LAND COMPANY, LLC,	)
	)
Defendant.	)

## SOUTHERN LAND COMPANY, LLC'S MOTION FOR LEAVE TO FILE MEMORANDUM IN SUPPORT OF SUMMARY JUDGMENT ON LISA ALYN'S CLAIMS UNDER SEAL

Pursuant to ¶¶ 10 and 19 of the Stipulated Protective Order (Doc. No. 61, pp. 9-10), as well as § 5.07 of the Administrative Practices and Procedures for Electronic Case Filing,

Defendant / Counter-Plaintiff Southern Land Company, LLC respectfully requests leave of Court to file its Memorandum in Support of its Motion for Summary Judgment on Lisa Alyn's claims under seal because it refers to information designated by Ms. Alyn as "attorney's eyes only" under the Stipulated Protective Order.

## Respectfully submitted,

s/ Kevin P. Hartley

Randy Michels (BPR # 21604) Bill Ferrell (BPR # 27220) Kevin Hartley (BPR # 29199) TRUST TREE LEGAL, P.C. 1321 Adams Street

Nashville, TN 37208 Telephone: (615) 852-8408 Email: randy@trust-tree.com Email: bill@trust-tree.com Email: kevin@trust-tree.com

Counsel for Defendant/Counterclaim Plaintiff SOUTHERN LAND COMPANY, LLC

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on August 26, 2016, a true and exact copy of the foregoing has been served via email and the Electronic Case Filing System of the United States District Court for the Middle District of Tennessee, which will automatically send email notification of such filing to the following attorneys of record:

Thomas K. Potter, III (BPR # 024857) John Paul Nefflen (BPR # 020226) BURR & FORMAN LLP 511 Union Street Suite 2300 Nashville, TN 37219

Telephone: (615) 724-3219 Email: tpotter@burr.com Email: jnefflen@burr.com

Gregory D. Latham
Stephen Kepper
INTELLECTUAL PROPERTY CONSULTING, LLC
334 Carondelet Street, Suite B
New Orleans LA 70130

Telephone: (504) 322-7166

Email: glatham@iplawconsulting.com Email: skepper@iplawconsulting.com

s/ Kevin P. Hartley
Counsel for Southern Land Company, LLC